

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**Robertson, Anschutz, Schneid, Crane & Partners, PLLC**  
Authorized Agent for Secured Creditor  
130 Clinton Road, Lobby B, Suite 202  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
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Harold Kaplan (HK0226)

In Re:

**ANDREW CICCAGLIONE**  
**Debtor,**

Case No.: 17-27605-JNP

Chapter: 13

Hearing Date: May 17, 2022

Judge: Jerrold N. Poslusny Jr.

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY**

HEARING DATE AND TIME:  
May 17, 2022 at 11:00 AM

**ORAL ARGUMENT IS REQUESTED IN THE EVENT  
OPPOSITION IS TIMELY FILED**

TO:

<b>Debtor(s)-</b> Andrew Ciccaglione 307 New Broadway Gloucester City, NJ 08030 CAMDEN-NJ  <b>Co-Debtor-</b> Nora Ciccaglione 307 New Broadway Gloucester City, NJ 08030 CAMDEN-NJ	<b>Debtor's/Debtors' Attorney-</b> Robert Braverman McDowell Law, PC 46 West Main Street Maple Shade, NJ 08052	<b>Trustee-</b> Isabel C. Balboa Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	<b>U.S. Trustee-</b> US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on May 17, 2022 at 11:00 AM or as soon thereafter as counsel may be heard, Robertson, Anschutz, Schneid, Crane & Partners, PLLC, attorneys for NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER, the within creditor ("Creditor"), shall move before the Honorable Jerrold N. Poslusny Jr , United States Bankruptcy Judge, at US Bankruptcy Court, District of New Jersey U.S. 400 Cooper Street, 4th Floor Camden, N.J. 08101 Courtroom 4C, for an Order pursuant to 11 U.S.C. §362(d)(1) granting such Creditor relief from automatic stay or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, 401 Market Street**

**Second Floor Camden, NJ 08101** and simultaneously served on Secured Creditor's counsel, 130 Clinton Road-Lobby B, Suite 202 Fairfield, NJ 07004, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED:4/22/2022

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PLLC**

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By: /s/ Harold Kaplan